

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

VALLEY HEALTH SYSTEM, LLC, a Delaware  
Limited Liability company, DVH HOSPITAL  
ALLIANCE, LLC, a Delaware Limited Liability  
company, and SUMMERLIN HOSPITAL  
MEDICAL CENTER, LLC, a Delaware Limited  
Liability company,

Plaintiffs,

vs.

TRAVEL INSURANCE FACILITIES, PLC, a  
Foreign Corporation, UNION  
REISEVERSICHERUNG  
AKTIENGESELLSCHAFT, a Foreign  
Corporation,

Defendants.

CASE NO.: 2:22-CV-00365-ART-DJA

**ORDER APPROVING  
STIPULATION TO EXTEND TIME  
FOR PLAINTIFFS TO FILE  
RESPONSE TO DEFENDANT UNION  
REISEVERSICHERUNG  
AKTIENGESELLSCHAFT'S  
MOTION TO DISMISS OR, IN THE  
ALTERNATIVE, FOR A MORE  
DEFINITE STATEMENT**

**[THIRD REQUEST]**

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IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs VALLEY HEALTH SYSTEM, LLC; DVH HOSPITAL ALLIANCE, LLC, and SUMMERLIN HOSPITAL MEDICAL CENTER, LLC (collectively, “Plaintiffs”) by and through their counsel of record, Timothy M. Hartley, Esq. (admitted *pro hac vice*) of the Hartley Law Offices and Jason M. Wiley, Esq. of the law firm Wiley Petersen and Defendant UNION REISERVERSICHERUNG AKTIENGESELLSCHAFT (“URV”) by and through its counsel of record, Pat Lundvall, Esq. and Daniel Aquino, Esq. of the law firm McDonald Carano to extend the time for Plaintiffs to file a response to *Defendant Union Reiseversicherung Aktiengesellschaft’s Motion to Dismiss or, in the Alternative, For a More Definite Statement* (“Motion”). ECF No. 24. The Motion was filed on June 30, 2022, and no hearing date has been scheduled. The parties respectfully request the Court enter an order extending Plaintiffs’ response to the Motion to September 11, 2022.

The parties offer the following reasons for the requested extension:

1. On June 30, 2022, URV filed its Motion.
2. In order to fully and adequately respond to URV’s Motion, Plaintiffs filed their *Motion for Leave to Conduct Limited Jurisdictional Discovery* (“Jurisdictional Discovery Motion”). ECF No. 25. On July 15, 2022, the Court denied the Jurisdictional Discovery Motion without prejudice, pending satisfaction of the meet and confer requirement under Local Rule IA 1-3(f). ECF No. 27.
3. Defendant TRAVEL INSURANCE FACILITIES, PLC (“TIF”), has yet to be served with the Summons and Complaint through international service procedures pursuant to Fed.R.Civ.P. 4.
4. It is anticipated that, once service does occur, TIF will assert similar argument as advanced by URV in its Motion.
5. During the extension period, the parties will utilize the time to (a) determine whether TIF has been served; (b) discuss how the Jurisdictional Discovery Motion to be refiled by Plaintiffs affects the Motion; and (c) formulate a plan regarding the Motion, Jurisdictional Discovery Motion, and other related matters.
6. Subsequent to the filing the *Stipulation and Order to Extend Time for Plaintiffs to*

1 *File Response to Defendant Union Reiseversicherung Aktiengesellschaft's Motion*  
 2 *to Dismiss or, in the Alternative, For a More Definite Statement [First Request]*  
 3 *("First Request")* [ECF No. 26], the parties have engaged in preliminary settlement  
 4 discussions and have tentatively agreed to meet to discuss resolution of all claims  
 5 and causes of action alleged.

- 6 7. The Court granted the First Request [ECF No. 28] setting July 22, 2022, as  
 7 Plaintiffs' response date to the Motion.
- 8 8. The Court then granted the Second Request [ECF No. 30] setting August 12, 2022  
 9 as Plaintiff's response date to the Motion.
- 10 9. The parties have undertaken multiple discussions as to the status of service on TIF  
 11 as well as URV's position towards Plaintiff's request for jurisdictional discovery.  
 12 It is anticipated that the parties will conduct a meeting/conference prior to the  
 13 requested extension deadline date of September 11, 2022 to discuss these issues, as  
 14 well as the parties' ongoing exploration of potential settlement.
- 15 10. The requested extension will not unduly prejudice any party to the litigation.

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11. The stipulation is made in good faith, not for purposes of delay, and will not cause undue harassment or delay.

DATED this 12<sup>th</sup> day of August, 2022

DATED this 12<sup>th</sup> day of August, 2022

**MCDONALD CARANO**

**WILEY PETERSEN**

/s/ Daniel Aquino

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*Attorneys for Plaintiffs*

**IT IS SO ORDERED:**

**DATED:** August 15, 2022



**ANNE R. TRAUM**

**UNITED STATES DISTRICT JUDGE**